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December 11, 2024

BY ECF

Hon. John P. Cronan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Gregory Gumucio
23 Cr. 595 (JPC)**

Dear Judge Cronan:

We write to respectfully request a temporary modification of Mr. Gumucio's conditions of release to allow him to travel to Florida with his children to visit his children's grandparents over the holidays in late December 2024 through early January 2025 and stay at an address to be provided to pretrial services. Pretrial services and the government do not object to this request.

At Mr. Gumucio's presentment on August 30, 2022, Magistrate Judge Jennifer E. Willis set the following bail conditions:

\$250,000 personal recognizance bond to be co-signed by two financially responsible persons and one individual with moral suasion (specifically, Mr. Gumucio's adult son); compliance with pretrial services supervision as directed; no airport travel (with specifics to be set by pretrial services); standalone location monitoring; no direct or indirect contact with any current or former employees of Yoga to the People identified by the government; no travel within 60 miles of the Canada border; surrender all travel documents with travel restricted to the Western District of Washington, the District of Oregon (solely for child's sports-related travel), and the Southern District of New York.

Over the last two years, Mr. Gumucio has been granted a number of bail modifications easing his pretrial travel restrictions. *See, e.g.*, Doc. No. 52 (Jan. 26, 2023) (modifying conditions to permit travel to Portland, OR to seek employment); Doc. No. 68 (Mar. 20, 2023) (modifying conditions to permit travel to the Eastern District of Washington for daughter's sporting events); Doc. No. 79 (April 24, 2023) (modifying bail to permit travel within the Eastern District of Washington and the District of Oregon, with no travel within ten miles of an airport); Doc. No. 126 (Sept. 29, 2023) (modifying conditions to permit travel to Pullman, WA and the District of Idaho, within ten miles of a small airport). This summer, this Court also granted a temporary

modification of Mr. Gumucio's travel restrictions to enable him to relocate his family from Washington state to Colorado state. Mr. Gumucio is now being supervised by the District of Colorado.

In the more than two years that Mr. Gumucio has been supervised by pretrial services, he has not incurred any violations whatsoever. His former pretrial services officer in Washington has noted that Mr. Gumucio "maintains contact with me regarding employment, travel, and the status of his case."

Accordingly, Mr. Gumucio respectfully requests a temporary modification of his conditions of release to allow him to travel to Florida with his children to visit his children's grandparents over the holidays in late December through early January and stay at an address to be provided to pretrial services. This would require Mr. Gumucio to provide a detailed travel itinerary to pretrial services in advance of his travel dates. The Court previously granted permission for Mr. Gumucio to visit the same grandparents this summer. Doc. No. 180 (Jun. 28, 2024). Pretrial services and the government do not object to this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.
Michael Arthus, Esq.

Counsel for Gregory Gumucio

cc: Counsel of record

SO ORDERED:

The request is granted. Mr. Gumucio's bail conditions are modified to allow him to travel to Florida in late December through early January and stay at an address to be provided to pretrial services. Mr. Gumucio shall provide a detailed itinerary to pretrial services in advance of his travel dates.



THE HONORABLE JOHN P. CRONAN
United States District Judge